

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Christopher S. Graham and Sara N.
Graham

Debtors

US Bank Trust National Association, as
Trustee of the PRP II Pals Investments Trust

v.

Sara N. Graham fka Sara N. Smith
Christopher S. Graham

Respondents

and

Ronda J. Winnecour, Trustee

Additional Respondent

CHAPTER 13

CASE NO. 15-70664-JAD

NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY

By: /s/ Matthew Gross
Matthew Gross, Esquire
DWALDMANLAW, P.C.
Attorneys for Movant
4900 Carlisle Pike, #182
Mechanicsburg, PA 17050
844-899-4162

Date: October 11, 2016

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Christopher S. Graham and Sara N.
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Debtors

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Respondents

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CHAPTER 13

CASE NO. 15-70664-JAD

MOTION NO. FILED UNDER LOCAL
BANKRUPTCY RULE 9013.4 SECTION 6

**NOTICE OF MOTION OF US BANK TRUST NATIONAL ASSOCIATION, AS
TRUSTEE OF THE PRP II PALS INVESTMENTS TRUST FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362 PURSUANT TO BANKRUPTCY
PROCEDURE RULE 4001**

NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE

**US BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE PRP II
PALS INVESTMENTS TRUST** has filed a **MOTION FOR RELIEF FROM AUTOMATIC
STAY** with the court to permit foreclosure of a lien on real property located at **PROPERTY
ADDRESS**.

**Your rights may be affected. You should read these papers carefully and discuss
them with your attorney, if you have one in this bankruptcy case. (If you do not have an
attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant the relief sought in the motion or if you want the
Court to consider your views on the motion, then on or before **October 26, 2016** you or your
attorney must do **all** of the following:

- (a) file an answer explaining your position at:
U.S. Bankruptcy Court
Western District of Pennsylvania
Bankruptcy Clerk of Courts
600 Grant Street
Pittsburgh, PA 15219

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early
enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's Attorney:

Matthew Gross, Esquire
DWALDMANLAW, P.C.
Attorneys for Movant
4900 Carlisle Pike, #182
Mechanicsburg, PA 17050
844-899-4162
844-882-4703 Fax

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Judge **Jeffrey A. Deller** on **November 4, 2016 at 10:00 AM, Courtroom B**, Penn Traffic Building, First Floor, 319 Washington St., Johnstown, PA 15901. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (814) 533-4246 to find out whether the hearing has been canceled because no one filed an answer.

By: /s/ Matthew Gross

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CASE NO. 15-70664-JAD

MOTION NO. FILED UNDER LOCAL
BANKRUPTCY RULE 9013.4 SECTION 6

CERTIFICATE OF SERVICE

I hereby certify that service upon all interested parties, indicated below, was made by sending true and correct copies of the Notice of Motion of Movant above for Relief from Automatic Stay, by First Class mail.¹

Date Served: October 11, 2016

Persons Served:

Michael N. Vaporis
26 South Sixth Street
Indiana, PA 15701

Christopher S. Graham and Sara N. Graham
208 Carlisle St.
Homer City, PA 15748

Ronda J. Winnecour, Trustee
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Office of the United States Trustee, U.S. Trustee
Liberty Center
1001 Liberty Ave., Suite 970
Pittsburgh, PA 15222

¹ Parties served by the court via ECF electronic notification are not also being served by regular mail.

By: /s/ Matthew Gross

Matthew Gross, Esquire
DWALDMANLAW, P.C.
Attorneys for Movant
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Mechanicsburg, PA 17050
844-899-4162

Date: October 11, 2016